

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

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JOSHUA GLASSCOCK, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

SIG SAUER, INC.,

Defendant.

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Case No.: 6:22-cv-3095-MDH

**DECLARATION OF COLLEEN M. GULLIVER IN SUPPORT OF SIG SAUER, INC.’S  
OPPOSITION TO PLAINTIFF’S MOTION FOR CLASS CERTIFICATION**

I, Colleen M. Gulliver, declare pursuant to 28 U.S.C. § 1746:

1. I am a member of the bar of the State of New York and am admitted *pro hac vice* to the bar of this Court. I am a partner at the law firm of DLA Piper LLP (US), counsel for Defendant Sig Sauer, Inc. (“Sig Sauer”) in this matter.

2. This declaration, together with the listed exhibits, is submitted in support of Sig Sauer’s Suggestions in Opposition to plaintiff Joshua Glasscock’s (“Plaintiff”) Motion for Class Certification (“Opposition”). This declaration is attached to the Opposition as **Exhibit 1**.

3. The facts set forth below are based on my personal knowledge and my familiarity with and access to records maintained by Sig Sauer in the regular course of business. If called as a witness, I could competently testify to the matters set forth in this declaration.

4. Attached to the Opposition as **Exhibit 2** is a true and correct copy of the Declaration of Thomas Taylor (“T. Taylor Decl.”), dated February 17, 2025, and Exhibits A – O to that declaration attached therein, of which the T. Taylor Decl. and its Exhibits M – O are designated as Confidential under the Protective Order.

5. Attached to the Opposition as **Exhibit 3** is a true and correct copy of the Declaration of Matthew Taylor, dated March 17, 2025, which is designated as Confidential under the Protective Order.

6. Attached to the Opposition as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the 30(b)(6) Deposition of Sig Sauer, via Matthew Taylor, dated September 10, 2024.

7. Attached to the Opposition as **Exhibit 5** is a true and correct copy of the Declaration of Sean Toner, dated February 27, 2025, and Exhibit 1 to that declaration attached therein, which are designated as Confidential under the Protective Order.

8. Attached to the Opposition as **Exhibit 6** is a true and correct copy of excerpts from the transcript of the 30(b)(6) Deposition of Sig Sauer, via Matthew Farkas, dated September 23, 2024.

9. Attached to the Opposition as **Exhibit 7** is a true and correct copy of the expert report of Derek Watkins submitted on Sig Sauer's behalf in this matter on March 31, 2025, which is designated as Confidential under the Protective Order.

10. Attached to the Opposition as **Exhibit 8** is a true and correct copy of a brochure for the Sig Sauer P320 Full-Size Model, produced in this action by Sig Sauer and bearing the beginning Bates number SIG-MARKETING-000213.

11. Attached to the Opposition as **Exhibit 9** is a true and correct copy of the Declaration of Phil Strader, dated March 25, 2025, which is designated as Confidential under the Protective Order.

12. Attached to the Opposition as **Exhibit 10** is a true and correct copy excerpts from a Sig Sauer 2017 Firearms Products Catalog, produced in this action by Sig Sauer and bearing beginning Bates number SIG-MARKETING-000102.

13. Attached to the Opposition as **Exhibit 11** is a true and correct copy of excerpts from the transcript of the May 16, 2023 deposition of Plaintiff.

14. Attached to the Opposition as **Exhibit 12** is a true and correct copy of excerpts from the transcript of the March 6, 2025 continued deposition of Plaintiff.

15. Attached to the Opposition as **Exhibit 13** is a true and correct copy of the expert report of Robert Rauschenberger, Ph.D., submitted on Sig Sauer's behalf in this matter on March 27, 2025, which is designated as Confidential under the Protective Order.

16. Attached to the Opposition as **Exhibit 14** is a true and correct copy of email correspondence from Thomas Taylor to Jordan Hunter and Allen McCormick dated August 9, 2017 regarding an article about Sig Sauer's Voluntary Upgrade Program, produced in this action by Sig Sauer and bearing beginning Bates number SIG-GLASSCOCK00007700, which is designated as Confidential under the Protective Order.

17. Attached to the Opposition as **Exhibit 15** is a true and correct copy of the transcript of the March 15, 2024 deposition of James Faulkner.

18. Attached to the Opposition as **Exhibit 16** is a true and correct copy of the Declaration of Ed Murphy, dated February 10, 2025, which is designated as Confidential under the Protective Order.

19. Attached to the Opposition as **Exhibit 17** is a true and correct copy of the Declaration of Christopher Meyer, dated February 4, 2025, and Exhibit 1 to that declaration attached therein, which are designated as Confidential under the Protective Order.

20. Attached to the Opposition as **Exhibit 18** is a true and correct copy of the Declaration of Matthew Farkas, dated February 4, 2025, which is designated as Confidential under the Protective Order.

21. Attached to the Opposition as **Exhibit 19** is a true and correct copy of a text message exchange between Mr. Faulkner and Plaintiff, dated March 29, 2020, produced by Mr. Faulkner without bearing any Bates stamping, in response to Sig Sauer's subpoena to produce documents issued to Mr. Faulkner (see ECF No. 75).

22. Attached to the Opposition as **Exhibit 20** is a true and correct copy of a text message exchange between Plaintiff and Mr. Faulkner, dated March 29, 2020, produced in this action by Plaintiff and bearing beginning Bates number Glasscock, Joshua 000016.

23. Attached to the Opposition as **Exhibit 21** is a true and correct copy of Plaintiff's Responses to Sig Sauer's First Set of Interrogatories, dated January 23, 2023.

24. Attached to the Opposition as **Exhibit 22** is a true and correct copy of a Sig Sauer Press Release titled "SIG SAUER Brings the U.S. Army's M17 to the Commercial Market," dated July 18, 2018, produced in this action by Sig Sauer and bearing beginning Bates number SIG-GLASSCOCK00006703, and marked as Exhibit 14 at the March 6, 2025 continued deposition of Plaintiff.

25. Attached to the Opposition as **Exhibit 23** is a true and correct copy of excerpts from a Sig Sauer 2018 Firearm Products Catalog, produced in this action by Sig Sauer and bearing beginning Bates number SIG-MARKETING0000107, and marked as Exhibit 15 at the March 6, 2025 continued deposition of Plaintiff.

26. Attached to the Opposition as **Exhibit 24** is a true and correct copy of a Sig Sauer advertisement, produced in this action by Sig Sauer and bearing beginning Bates number SIG-MARKETING-000096.

27. Attached to the Opposition as **Exhibit 25** is a true and correct copy of a 2016 P320 Advertisement dated March 29, 2016, produced in this action by Sig Sauer and bearing beginning Bates number SIG-MARKETING-000051, and marked as Exhibit 6 at the March 6, 2025 continued deposition of Plaintiff.

28. Attached to the Opposition as **Exhibit 26** is a true and correct copy of the expert report of Jonathan Tomlin, Ph.D., submitted on Sig Sauer's behalf in this matter on March 30, 2025, which is designated as Confidential under the Protective Order.

29. Attached to the Opposition as **Exhibit 27** is a true and correct copy of an email from Plaintiff to Todd Werts dated March 9, 2022, produced in this action by Plaintiff and bearing beginning Bates number Glasscock, Joshua 000027, and marked as Exhibit 11 at the March 6, 2025 continued deposition of Plaintiff.

30. Attached to the Opposition as **Exhibit 28** is a true and correct copy of the transcript of the May 28, 2024 continued deposition of James Faulkner.

31. Attached to the Opposition as **Exhibit 29** is a true and correct copy of Mr. Faulkner's Firearm Transaction Record dated August 7, 2018, marked as Exhibit 9 at the May 28, 2024 continued deposition of Mr. Faulkner.

32. Attached to the Opposition as **Exhibit 30** is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sig Sauer, via Christopher Meyer, dated September 11, 2024.

33. Attached to the Opposition as **Exhibit 31** is a true and correct copy of the transcript of the 30(b)(6) Deposition of Sig Sauer, via Thomas Taylor, dated September 12, 2024.

34. Attached to the Opposition as **Exhibit 32** is a true and correct copy of Plaintiff's P320 Owner's Manual dated September 27, 2017, produced in this action by Plaintiff and bearing beginning Bates number Glasscock, Joshua 000041-89, and marked as Exhibit 9 at the March 6, 2025 continued deposition of Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2025  
Brooklyn, New York

A handwritten signature in purple ink, appearing to read 'C. M. Gulliver', is written above a horizontal line.

Colleen M. Gulliver